



## CULPEPPER IP, LLLC

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PATENTS, TRADEMARKS & COPYRIGHTS

KERRY S. CULPEPPER \*

\* ADMITTED TO PRACTICE IN VIRGINIA, HAWAII  
AND BEFORE THE USPTO

September 6, 2019

**VIA FIRST CLASS MAIL**

Copyright Agent, Justin Paine  
Cloudflare  
101 Townsend Street  
Legal Department  
San Francisco, CA 94107

Re: Copyright Claim of allegation of contributory copyright infringement on  
websites registered or affiliated with Cloudflare

Dear Sirs:

An physical or electronic signature of the copyright owner, or a person authorized to act  
on behalf of the owner, of an exclusive copyright that has allegedly been infringed.

Kerry S. Culpepper authorized to act on behalf of owners HB Productions, Inc.

/Kerry S. Culpepper/

Identification of the copyrighted work claimed to have been infringed, or, if multiple  
copyrighted works at a single online site are covered by a single notification, a representative  
list of such works on that site.

Infringement of the motion picture Hellboy is induced by (1) the link to download the  
movie piracy app "Cotomovies" at the websites:

appvalley.vip

app-valley.vip

Identification of the material that is claimed to be infringing or to be the subject of  
infringing activity and that is to be removed or access to which is to be disabled, and information  
reasonably sufficient to permit cloudflare.com to locate the material.

(1) the link to download the cotomovies app at the websites:

appvalley.vip at IP Address 104.24.2.5

app-valley.vip at IP Address 172.64.170.30

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Information reasonably sufficient to permit cloudflare.com to contact the Complaining Party, such as an address, telephone number, and, if available, an electronic mail address at which the Complaining Party may be contacted.

Kerry S. Culpepper, Esq.,

Culpepper IP, LLLC,

75-170 Hualalai Road,

Suite B204,

Kailua-Kona, Hawaii 96740

US Tel 1-808-464-4047

[kculpepper@culpepperip.com](mailto:kculpepper@culpepperip.com)

A statement that the Complaining Party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I, have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

A statement that the information in the notification is accurate, and under penalty of perjury, that the Complaining Party is the owner, or is authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

The information in the notification is accurate, and under penalty of perjury, I am authorized to act on behalf of the owners, HB Productions, Inc of an exclusive right that is allegedly infringed.

Sincerely,  
/ksc/

Kerry S. Culpepper